

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

v.

*

Crim. No. RDB-19-337

DARRYL ALBERT VARNUM

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* * * * *

CONSENT MOTION TO MODIFY CONDITIONS OF PRE-TRIAL RELEASE

Darryl Varnum (“Mr. Varnum”), by and through his undersigned counsel, James Wyda, Federal Public Defender for the District of Maryland and Brendan A. Hurson, Assistant Federal Public Defender, hereby asks the Court to modify his conditions of pretrial release to remove location monitoring and a curfew. The government and Pre-trial Services consent to this request. In support, Mr. Varnum asserts the following:

1. Mr. Varnum has pleaded guilty to sending a threatening interstate communication in violation of 18 U.S.C. § 115(a)(1)(B). Sentencing is scheduled for July 7, 2020 at 11:00 a.m.
2. In an order entered on August 5, 2019 (and amended on August 13, 2019), Mr. Varnum was released to reside at his home under conditions including a 9:00 p.m. to 5:00 a.m. curfew and location monitoring. See ECF/CM 21, 23.
3. Mr. Varnum has abided by all conditions of release and has no notices of alleged violations in nearly a year of supervision. He resides with his wife and children outside of Baltimore and has not missed a court date or a meeting with counsel. He has frequent medical appointments and counseling commitments, all approved by Pre-trial Services, and shows no need for heightened supervision. Accordingly, the government and Pre-trial Services do not object to the removal of the location monitoring and curfew requirements.

WHEREFORE, Mr. Varnum, with the consent of the government and Pre-trial Services, asks the Court to issue an order removing the curfew and location monitoring requirements from Mr. Varnum's conditions of release. A proposed order is attached.

Respectfully submitted,

JAMES WYDA
Federal Public Defender

/s/

BRENDAN A. HURSON (#28179)
Assistant Federal Public Defender
100 South Charles Street
Tower II, 9th Floor
Baltimore, Maryland 21201
Phone: (410) 962-3962
Fax: (410) 962-0872
Email: Brendan_Hurson@fd.org